

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA
Plaintiff

v.

Civil Action No: 1:22-cv-01314

ALICIA KELSEY Solely in Her Capacity as
Heir of Shelley Raye Smith, Deceased
JOSHUA RUPERT Solely in His Capacity as
Heir of Shelley Raye Smith, Deceased
JUDSON RUPERT Solely in His Capacity as
Heir of Shelley Raye Smith, Deceased
The Unknown Heirs of Shelley Raye Smith,
Deceased

MEMORANDUM OF LAW IN SUPPORT OF MOTION
FOR SUBSTITUTED SERVICE UNDER Pa.R.C.P. 430(a)

Plaintiff has filed a Complaint in Mortgage Foreclosure against Defendant(s), which the Plaintiff has been unable to personally serve upon Defendant, The Unknown Heirs of Shelley Raye Smith, Deceased. As noted in the attached Motion, Plaintiff has made a good faith attempt to ascertain the whereabouts of the Defendant(s) without success. Accordingly, the Court may approve alternative means of service. See Pa.R.C.P. 430(a).

CONCLUSION

For reasons stated above and in the attached Motion, the Court should enter an order allowing Plaintiff to serve the Complaint in Mortgage Foreclosure upon Defendant, The

Unknown Heirs of Shelley Raye Smith, Deceased by posting the property and certified mail and regular mail to the last known address of the Defendant(s).

Respectfully submitted,
KML Law Group, P.C.

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